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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 3:22-CR-00316-JD
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
v.)	NOVEMBER 30, 2022 TO FEBRUARY 6, 2023
)	AND [PROPOSED] ORDER
JULIAN CISNEROS)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Julian Cisneros, that the next status conference be set for February 6, 2023. Counsel further stipulates that time be excluded under the Speedy Trial Act from November 30, 2022 until February 6, 2023.

At the status conference held on November 14, 2022, counsel for the defendant stated he and the defendant were continuing to review the discovery and pursue other investigative leads. For this reason and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until February 6, 2023 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from November 30, 2022 until February 6, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),

1 (B)(iv).

2 The undersigned Assistant United States Attorney certifies that she has obtained approval from
3 counsel for the defendant to file this stipulation and proposed order.

4 IT IS SO STIPULATED.

5 DATED: November 30, 2022

/s/
KELSEY C. DAVIDSON
Assistant United States Attorney

7 DATED: November 30, 2022

/s/
DAVID RIZK
Counsel for Defendant Julian Cisneros

10 ~~PROPOSED~~ ORDER

11 Based upon the facts set forth in the stipulation of the parties and the representations made to the
12 Court on November 30, 2022 and for good cause shown, the Court finds that the next status conference
13 should be set for February 6, 2023, and that failing to exclude the time from November 30, 2022 through
14 February 6, 2023 would unreasonably deny defense counsel and the defendant the reasonable time
15 necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
16 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
17 November 30, 2022 until February 6, 2023 from computation under the Speedy Trial Act outweigh the
18 best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the
19 parties, IT IS HEREBY ORDERED that the next status conference should be set for February 6, 2023 and
20 that time from November 30, 2022 until February 6, 2023 shall be excluded from computation under the
21 Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

22 IT IS SO ORDERED.

24 DATED: December 1, 2022


JAMES DONATO
United States District Judge